

June 16, 2006

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity of Rule R511993. This rule could prevent me from continuing as an Independent Sunrider Distributor. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Sunrider® products.

One of the most confusing sections of the proposed rule is the seven-day waiting period to enroll new Distributors. The cost of the Sunrider's Starter Pack is \$140. You do not need to purchase the Starter Pack to become an Independent Sunrider Distributor. I am also concerned that the 7 day waiting period gives the impression that there might be something wrong with the plan. I also think this seven-day waiting period is unnecessary since Sunrider has always put in place a 60-day return policy for existing Distributors that is applicable to all products, including the Sunrider® Starter Pack. Also, the products purchased from Sunrider has a 90% buyback policy for former Distributors applicable to all products purchased within the last twelve months. Another concern that I have with the seven-day waiting period is the administrative burden of keeping very detailed records and then sending numerous reports to Sunrider headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. It does not make sense to me that I would have to disclose these lawsuits unless Sunrider is found guilty. Otherwise, Sunrider and I are put at an unfair advantage even though Sunrider has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am happy to provide references; however with many cases of identity theft, I am not uncomfortable releasing and providing the personal information of individuals without their approval. I also feel that giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Sunrider headquarters and then wait for the list. The following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson: "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers."

I have been an Independent Sunrider Distributor for 15 years. I became a Distributor of Sunrider's products because I enjoy the product and wanted to share with my friends and family. I also saw the business opportunity and I depend on this extra income to supplement my budget.

I can truly understand and appreciate the work of the FTC to protect consumers. I strongly believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you in advance for your time.

Sincerely,

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